

Max Morgan

From: lcasson@andreou-casson.com
Sent: Thursday, October 19, 2023 1:46 PM
To: Max Morgan; lquan@andreou-casson.com
Cc: 'Jeff Blake'; 'Justin Nematzadeh'; 'Elan Stone'; Wendy Cespedes
Subject: RE: Clewett et al. v. NPSC PAC et al.

Max:

I will have to ask you for some additional time to respond. Any objection to October 27th for updated responses?

Luke A. Casson

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From: Max Morgan <max.morgan@theweitzfirm.com>
Sent: Wednesday, October 18, 2023 6:41 AM
To: lcasson@andreou-casson.com; lquan@andreou-casson.com
Cc: Jeff Blake <jeff@attorneyzim.com>; Justin Nematzadeh <jsn@nematlawyers.com>; Elan Stone <elan@davidovichlaw.com>
Subject: Clewett et al. v. NPSC PAC et al.

Dear Luke:

I am writing to follow up with you following our discovery call.

EXHIBIT
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During the call, Mr. Pulciani agreed to provide amended responses by Friday, October 20, 2023. Specifically, we asked that Mr. Pulciani review his responses to RFP 16, 17, 25, 26 and Interrogatories 11, 12. These responses included only

objections, without an indication of whether Defendant is withholding documents. For example, with respect to RFP 17, Mr. Pulciani objects and does not state whether he is withholding documents. Based on NPSC's answers to discovery, it is our understanding that Mr. Pulciani has been involved in prior TCPA litigation directly and is therefore withholding documents in response to this request.

With respect to the interrogatories, we asked that Mr. Pulciani review his response to Interrogatory 13, 14. With respect to interrogatory 13, we clarified that we are seeking information for the last 4 years, not presently. For Interrogatories 14 and 17, we pointed out the responses were inconsistent with the documents produced and NPSC PAC's discovery responses.

Finally, with respect to Interrogatory 18, which states Mr. Pulciani did not search any devices or files, we asked that he review this response and review the places likely to have discoverable information.

We look forward to your response.

Regards,

Max



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